

LaMonica Herbst & Maniscalco, LLP
3305 Jerusalem Avenue, Suite 201
Wantagh, New York 11793
(516) 826-6500
Adam P. Wofse, Esq.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11
Case No. 14-70203-REG
(Joint Administration)

DOLLAR STORAGE LLC, d/b/a 2 K&H
LLC, *et al.*,

Debtors.

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AFFIRMATION PURSUANT TO LOCAL RULE 9077-1(a)
IN SUPPORT OF THE ORDER SCHEDULING AN EXPEDITED HEARING

Adam P. Wofse, Esq., an attorney duly admitted to practice before this Court states under the penalties of perjury:

1. I am a partner of the firm LaMonica Herbst & Maniscalco, LLP, counsel for debtors Dollar Storage LLC, d/b/a 2 K&H LLC and Jul-Bet Enterprises LLC (the “Debtors”).

2. I am submitting this affirmation in accordance with Local Bankruptcy Rule 9077-1(a) in support of the Order Scheduling a Hearing on Shortened Notice in connection with the Debtors’ motion (the “Motion”) seeking the entry of an Order authorizing the Debtors to employ GA Keen Realty Advisors (“Keen”) as a real estate and business broker for the Debtors to market and possibly sell the Debtor’s real property and business located at 2080 River Road, Calverton, New York 11933.

3. The Debtors are related entities that own and operate a self-storage business and the real estate located at 2080 River Road, Calverton, New York.

4. The Debtors are proceeding by Order Scheduling an Expedited Hearing because of the exigent and applicable circumstances herein.

5. Specifically, the Debtors sought the protections afforded under Chapter 11 of the

Bankruptcy Code in order to provide, among other things, the necessary breathing spell for the Debtors to appropriately and professionally market and possibly sell the Debtors' real estate and associated business. Other workout or rehabilitation options remain open to the Debtors, however, it is critical to move forward with a marketing and possible sale process in order to obtain and provide essential information, especially concerning the potential value of the assets, since this avenue may prove the most beneficial for a maximum recovery for creditors.

6. Further, the Debtors' secured creditor, APC River Partners LLC ("APC") has authorized use of cash collateral through March 5, 2014. Such use of cash collateral was approved by this Court by So Ordered stipulation dated February 20, 2014. The Debtors desire to demonstrate to APC, the Court and all interested parties that it is serious in its pursuit of a prudent marketing and sale process as an option that may yield the best recovery for the benefit of the estates and their creditors.

7. To this end, the Debtors have interviewed and selected Keen as its real estate and business broker to pursue this endeavor based upon Keen's vast experience and success in marketing and sale matters of this type.

8. It is imperative that the hearing to consider and approve the relief requested in the Motion be scheduled as expeditiously as possible. Although a hearing is not ordinarily required for a debtor's retention of a broker—out of an abundance of caution, and given the stance of APC based upon its pending motions filed in these cases seeking drastic relief—the Debtors desire to proceed with a hearing on an expedited basis in order to provide full disclosure and an opportunity to be heard by all interested parties. Indeed, counsel for the Debtors has had several discussions with counsel for APC in which the undersigned informed counsel for APC that the Debtors would proceed forthwith with a motion seeking to employ Keen.

9. Moreover, this geographic area is currently entering the prime season for the

marketing and sale of real estate and associated businesses. Therefore, the Debtors wish to seize upon this opportunity.

10. It is the Debtors' goal to demonstrate to APC, the Court and all interested parties that the Debtors are undertaking a provident marketing and possible sale process, as proposed by the Debtors with the effective assistance of counsel and through the efforts of Keen, in good faith. The Debtors desire that they continue to operate with the use of cash collateral with the consent of APC on a going forward basis, in order to (a) effectuate the efficient administration of these cases, and (b) avoid unnecessary and wasteful administrative costs to the estates.

11. Based upon the above circumstances, the Debtors submit that the Court should grant an expedited hearing and approve the relief requested in the Motion.

12. No previous request for relief sought in the Motion has been made to this or any other Court.

Dated: February 20, 2014
Wantagh, New York

LAMONICA HERBST & MANISCALCO, LLP
Counsel to the Debtors

By: s/Adam P. Wofse
Adam P. Wofse, Esq.
Partner
3305 Jerusalem Avenue
Wantagh, New York 11793
Ph. 516.826.6500